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Attorneys for Defendants  
BAYER HEALTHCARE PHARMACEUTICALS INC.  
and BAYER HEALTHCARE LLC

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 JOE V. SANCHEZ and SANDRA L.  
12 ROARTY-SANCHEZ,,

Plaintiffs,

13  
14 v.

15 BAYER HEALTHCARE  
16 PHARMACEUTICALS, INC.; BAYER  
17 HEALTHCARE LLC; GENERAL  
18 ELECTRIC COMPANY; GE  
19 HEALTHCARE, INC.; TYCO  
INTERNATIONAL, INC.; COVIDIEN,  
INC.; TYCO HEALTHCARE GROUP, LP;  
MALLINCKRODT, INC.; and BRACCO  
DIAGNOSTICS, INC.,

20 Defendants.  
21

Case No. CV-08-0973 (EMC)

**CORPORATE DISCLOSURE  
STATEMENT OF BAYER  
HEALTHCARE PHARMACEUTICALS  
INC. AND BAYER HEALTHCARE  
LLC**

**(Pending Transfer to: In re: Gadolinium  
Contrast Dyes Products Liability  
Litigation, MDL No. 1909, N.D. Ohio)**

**[F.R.C.P. 7.1]**

22 Pursuant to Federal Rule of Civil Procedure 7.1(a), Defendants Bayer HealthCare  
23 Pharmaceuticals Inc. and Bayer HealthCare LLC make this their Corporate Disclosure  
24 Statement. Defendants Bayer HealthCare Pharmaceuticals Inc. and Bayer HealthCare  
25 LLC state that they are nongovernmental corporations.

26 Defendant Bayer HealthCare Pharmaceuticals Inc. is wholly owned by Schering  
27 Berlin, Inc. Schering Berlin, Inc. is wholly owned by Defendant Bayer HealthCare LLC.  
28 Defendant Bayer HealthCare LLC is wholly owned by Bayer Corporation. Bayer

1 Corporation is wholly owned by Bayer AG. Bayer AG is publicly traded in Germany and  
2 its American Depositary shares are listed on the New York Stock Exchange.

3 No other publicly held company owns ten percent (10%) or more of the stock of  
4 Defendants Bayer HealthCare Pharmaceuticals Inc. or Bayer HealthCare LLC.

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6 Dated: March 12, 2008

DRINKER BIDDLE & REATH LLP

7 /S/ Rodney M. Hudson  
8 RODNEY M. HUDSON

9 Attorneys for Defendants  
10 BAYER HEALTHCARE  
11 PHARMACEUTICALS INC. and BAYER  
12 HEALTHCARE LLC  
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